

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Motion to Compel Discovery Necessary for Further Trade Secret Identification.

2. Attached as Exhibit “A” is a true and correct copy of e-mail correspondence between counsel for Moog and Defendants’ between July 27 and August 3, 2022.

3. Attached as Exhibit “B” are true and correct copies of certain chat messages between defendants Misook Kim and Robert Alin Pilkington from December 2021 discussing Moog’s software and programs, and produced by them in this litigation under Bates numbers

P&K Defendants 000262, 287, 288, 301. These documents are being filed under seal given that they are designated by Individual Defendants as “HIGHLY CONFIDENTIAL—SOURCE CODE” under the Protective Order.

4. Attached as Exhibit “C” is a true and correct copy of e-mail correspondence between counsel for all parties and iDS on July 26, 2022.

5. Attached as Exhibit “D” is a true and correct copy of Skyrise’s May 4, 2022 letter, that the Court has ordered to be unsealed in its entirety (ECF 172, 207).

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: August 3, 2022

/s/ Rena Andoh

Rena Andoh